

Ahren A. Tiller, Esq. [SBN 250608]
BLC LAW CENTER, APC
1230 Columbia St., Suite 1100
San Diego, CA 92101
Telephone No. (619) 894-8831
Facsimile No. (866) 444-7026
Email: ahren.tiller@blc-sd.com

Attorneys for Creditors
JAIME RODRIGUEZ, and
ANA LIDIA GOMEZ

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re

THE ORIGINAL MOWBRAY'S TREE
SERVICE, INC., a Delaware corporation

Debtor and
Debtor-in-Possession,

BK Case No.: 8:24-bk-12674-TA

Chapter 11

**DECLARATION OF RONNIE JORDAN
IN SUPPORT OF MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF CREDITOR, JAIME
RODRIGUEZ AND ANA LIDIA
GOMEZ'S MOTION TO APPOINT A
CHAPTER 11 TRUSTEE PURSUANT TO
11 U.S.C. 1104(a); AND MOTION TO
SUBSTANTIVELY CONSOLIDATE PINO
TREE SERVICES, INC., MOWBRAY
WATERMAN PROPERTY, LLC, AND
PHOENIX TRAFFIC MANAGEMENT,
INC. WITH THE DEBTOR'S
BANKRUPTCY CASE**

Date:

Time:

Location: 411 West Fourth St. Ctrm 5B
Santa Ana, CA 92701

Hon. Theodor C. Albert

DECLARATION OF RONNIE JORDAN

I, Ronnie Jordan have personal knowledge of each fact set forth in this declaration based upon my observation of, participation in, and recollection of, the matters and events to which I declare. I could and would competently testify to each fact set forth in this declaration if called and duly sworn by this Court. I certify and declare as follows:

1. I am an individual over 18 years of age for all times relevant and resident of North Carolina.

2. I was recruited to be THE ORIGINAL MOWBRAY’S TREE SERVICE, INC.’s (“MTS” and “Debtor”) Chief Executive Officer and commenced work in that roll as of early June 2018.

2. On May 10, 2019, because I had acquired record contracts and revenues for the Debtor in my first year with them, Mowbray Waterman Properties LLC (“MWP”) purchased a property for \$691,500 located at: 1515 Lucas Lane, Redlands, CA 92374-2758 (APN: 0168-071-62) (“Lucas Lane Property”) as part of my compensation package for use as my personal residence (Ex. 13). My wife and I were informed about the Lucas Lane Property after it had been acquired when Robin Mowbray handed us the keys and said this is your new home.

3. I was promised conveyance of title to the Lucas Lane Property at the end of my contract term, and while myself and my wife lived there we treated it as our own, were not charged any rent and all expenses and maintenance was paid by MTS or MWP.

4. After I was terminated as CEO for the Debtor in January of 2022, MWP attempted to evict me from the Lucas Lane Property, and during eviction proceedings MWP through Robin Mowbray’s supporting declaration confirmed to the court that I was an ex-employee of Mowbray Waterman Property, LLC. I concurred in that assessment because I worked for both companies.

5. While I was employed by MTS and MWP, I observed that the two companies were run by Robin Mowbray is if one company. My joint-employment and buying the house for my wife and I are examples of the one company observations.

1 I certify and declare under the penalty of perjury under the laws of the Unites States of
2 America that the foregoing is true and correct.

3 Executed 1/28/2025 at Robbinsville, NC
4

5 DocuSigned by:

63D6D3534924432...

6 Ronnie Jordan
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28